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WILLIAM HILL US

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RICHARD SCOTT,

Plaintiff,

vs.

AMERICAN WAGERING, INC. d/b/a  
WILLIAM HILL US, a domestic  
corporation; AND DOES 1-50, inclusive,

Defendant.

Case No. 2:20-cv-01282-JCM-DJA

**STIPULATION AND ORDER TO EXTEND  
DISCOVERY DEADLINES**

**[FOURTH REQUEST]**

Pursuant to Local Rule IA 6-1 and Local Rule 26-3, Defendant AMERICAN WAGERING, INC. d/b/a WILLIAM HILL US (“Defendant”) and Plaintiff RICHARD SCOTT (“Plaintiff”), by and through their undersigned counsel, hereby stipulate to amend the Discovery Plan and Scheduling Order (ECF No. 21) by extending the outstanding discovery deadlines for a period of sixty (60) days.

This is the Fourth request for an extension to the Discovery Plan and Scheduling Order in this matter. The requested extension is sought in good faith and not for purposes of undue delay. This request is submitted at least twenty-one (21) days or more before the expiration of the subject deadlines.

**DISCOVERY COMPLETED TO DATE**

Defendant served its initial disclosures on September 15, 2020. Plaintiff served his initial disclosures on or about September 17, 2020. On October 28, 2020, Plaintiff propounded written Requests for Production of Documents and Interrogatories on Defendant. Defendant responded to Plaintiff's discovery on December 30, 2020. Defendant propounded its First Set of Interrogatories and Requests for Production of Documents on Defendant 2, 2020. Plaintiff responded to Defendant's Request for Production of Documents on February 11, 2020, and Defendant's Interrogatories on February 12, 2020. Defendant has issued subpoenas based on Plaintiff's responses to written discovery. Plaintiff supplemented his disclosures on February 11, 2020. Defendant supplemented its disclosures on December 30, 2020, and August 4, 2020.

**DISCOVERY THAT REMAINS TO BE COMPLETED**

Defendant intends to take Plaintiff's deposition together with any percipient witnesses. Plaintiff intends to depose Defendant's Person Most Knowledgeable together with any percipient witnesses.

**REASONS FOR EXTENSION TO COMPLETE DISCOVERY**

This extension is necessary to allow both parties ample time to complete all appropriate discovery. Specifically, additional time is needed to take depositions as Plaintiff has been out of the country for an extended period of time and is not returning to Nevada until the end of September. The parties had in place a deposition schedule to complete contemplated depositions on September 29 and October 5, 2021. However, due to unanticipated scheduling issues, the October 5, 2011 date was vacated for Defendant's Person Most Knowledgeable. Plaintiff's deposition is taking place on October 5, 2021. The parties are currently negotiating dates for depositions of Defendant's corporate representative, but due to scheduling conflicts of counsel and the parties, additional time is needed to reschedule these depositions beyond the currently scheduled close of discovery on October 28, 2021. The parties believe that, absent any unforeseen circumstances, all necessary discovery can be accomplished by the requested extended deadline. Good cause exists to extend all deadlines in order to permit the parties to achieve their respective stated discovery goals and in consideration of current restrictions in place related to the COVID-19 pandemic.

**PROPOSED REVISED DISCOVERY PLAN**

1. Discovery Cut-Off Deadline

The discovery cut-off deadline shall be extended for sixty (60) days from October 28, 2021 to **Monday, December 27, 2021.**

2. Dispositive Motions Deadline

The dispositive motion deadline shall be extended to **Wednesday, January 26, 2022.**

3. Joint Pretrial Order Deadline

If no dispositive motions are filed, and unless otherwise ordered by this Court, the Joint Pretrial Order shall be extended to **Friday, February 25, 2022.** In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motions or otherwise by further order of the Court.

4. Extensions or Modification of the Discovery Plan and Scheduling Order

In accordance with Local Rule 26-3, any stipulation or motion for modification or extension of this discovery plan and scheduling order must be made at least twenty-one (21) days prior to the expiration of the subject deadline.

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Accordingly, the parties stipulate, subject to approval of this Court, to the following new proposed deadlines:

	Current Deadline	Revised Deadline
Discovery Cut-Off	Monday, October 28, 2021	<b>Monday, December 27, 2021</b>
Dispositive Motions	Thursday, November 25, 2021	<b>Wednesday, January 26, 2022</b>
Joint Pretrial Order	Monday, December 27, 2021	<b>Friday, February 25, 2022<sup>1</sup></b>

Dated: September 30, 2021

Dated: September 30, 2021

Respectfully submitted,

Respectfully submitted,

/s/ Theresa M. Santos

/s/ Diana G. Dickinson

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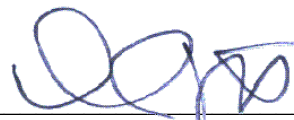
Attorneys for Plaintiff  
RICHARD SCOTT

Attorneys for Defendant  
AMERICAN WAGERING, INC. d/b/a  
WILLIAM HILL US

## ORDER

### IT IS SO ORDERED.

Dated: October 1, 2021.



UNITED STATES MAGISTRATE JUDGE

4827-6255-5645.1 / 092768-1004

<sup>1</sup> In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motions or otherwise by further order of the Court.